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June 24, 2016

VIA ECF AND
FIRST CLASS MAIL

Honorable Katharine S. Hayden, U.S.D.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Room 4015
Newark, New Jersey 07101

Re: Newark Watershed Conservation and Development Corporation
Case No.: 15-10019 (VFP)

Newark Watershed Conservation and Development Corp.
v. Linda Watkins-Brashear, *et al.*
Adv. Proc. No.: 15-02397 (VFP); Case No.: 2:15-cv-08393-KSH-CLW

Dear Judge Hayden:

This firm represents defendant Vaughn L. McKoy ("McKoy") in the referenced action and the related Adversary Proceeding that is pending in the United States Bankruptcy Court. We are in receipt of the Court's Order that was entered earlier today terminating the motion filed by former co-defendant, Cory A. Booker ("Booker"), to withdraw the reference of this matter to the Bankruptcy Court pursuant to 28 U.S.C. §157(d), on the basis that it is now moot, and closing this case.

We wish to bring to the Court's attention that McKoy filed a letter submission on January 11, 2016 [Doc. No. 13] joining in Booker's motion. This issue was discussed yesterday during a scheduled Case Management Conference with the Bankruptcy Court, during which the parties understood that the motion would remain pending due to McKoy's joinder in the motion and his continued support for the requested relief. Because McKoy remains of the belief that the

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reference to the Bankruptcy Court should be withdrawn for the reasons expressed in Booker's motion, and in our January 11, 2016 letter submission (which was filed during my tenure at a prior law firm, Herrick, Feinstein LLP), we respectfully request that the Court revisit the Order that was entered terminating the motion, restore Booker's motion to the docket and decide the application on the merits.

We thank the Court for its courtesies, consideration and attention to this matter.

Respectfully submitted,

/s/ Jaimee Katz Sussner
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